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December 19, 2022

BY ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Bahadorifar, et al., 21 CR 430 (SDNY)

Dear Judge Abrams:

I am writing on behalf of defendant Niloufar Bahadorifar to respectfully request a modification of the defendant's conditions of release which would permit her to travel from her home in California to Nevada to visit with family from December 25 through December 28, 2022. The government, by AUSA Matthew Hellman, has no objection to this request and Pretrial Services from the Central District of California takes no position, but notes that the defendant has been compliant with her conditions of release. Should this application be approved by the Court, Ms. Bahadorifar will provide Pretrial Services with a detailed itinerary of her trip.

By way of background, on July 2, 2021, Your Honor released Ms. Bahadorifar on a \$250K personal recognizance bond signed by the defendant and two financially responsible persons, with conditions of release including, inter alia, surrender of all travel documents and travel limited to the Central District of California and the Southern District of New York, and location monitoring and a curfew subject to the discretion of Pretrial Services. Since that date, the defendant has remained compliant with her conditions of release.

JEFFREY LICHTMAN

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Thank you for the Court's consideration on this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

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Jeffrey Lichtman

cc: All counsel (by ECF)

So Ordered:

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams
December 20, 2022